

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
The Development of Operational, Technical)	WT Docket No. 96-86
and Spectrum Requirements for Meeting)	
Federal, State and Local Public Safety)	
Communications Requirements Through)	
the)	
Year 2010)	

**REPLY COMMENTS OF PINELLAS COUNTY EMERGENCY
COMMUNICATIONS**

Pinellas County Emergency Communications (Pinellas County) hereby replies to the comments filed in response to the Commission's *Eighth Notice of Proposed Rulemaking* in the above-captioned proceeding.¹ Pinellas County, Florida is among the largest counties in the United States and serves a permanent population of over 925,000 in west central Florida. We are dedicated to providing state of the art communications for over 4,000 public safety personnel. We pride ourselves as being in the forefront of field testing advanced high speed data and video communications, applying several developing technologies at various bandwidths and applications. Between December 2000 and August 2002, Pinellas County conducted the first test of wideband technology, using an experimental

¹ *The Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010*, Eighth Notice of Proposed Rulemaking, 71 Fed Reg 17786 (2006) ("*Eighth NPRM*").

license on wideband channels in the 700 MHz band. Currently, Pinellas County is conducting tests of various broadband technologies in the 4.9 GHz public safety broadband spectrum.

Pinellas County is very concerned with the Comments filed in this proceeding by Lucent, Lockheed Martin, Northrop Grumman Information Technology, and Qualcomm because they all argue that the Commission should mandate the use of only broadband technology in the 700 MHz public safety band. We urge the Commission not to limit this segment of the band to only one technology type, as is argued in a somewhat self-serving manner by these broadband providers. Instead, we strongly agree with the Comments filed by all public safety representatives, as well as many other technology providers, that urge the Commission to ensure flexibility of solution choices in this band. As we noted above, Pinellas County is evaluating several technology solutions, both broadband and wideband, and we must continue to have the ability to choose the technologies that best fit our requirements.

While we are very interested in implementing advanced communications that best fit our needs in Pinellas County, we also are concerned about protecting our voice systems in the adjacent 700 MHz public safety narrowband voice channels. We agree with the Comments universally filed by public safety as well as the commercial community in support of the need for such interference protection by the Commission. Therefore, we urge the Commission to develop rules that protect

our voice systems from any and all interference by high speed data and video systems, regardless of their bandwidth.

Respectfully submitted,

Pamela J. Montanari, Radio Systems Manager

Pinellas County Emergency Communications

July 3, 2006